

NERC and Regional Coordination Update

June, 2011

Standards	Project	Activity	Due Date
NERC	<p>Project 2007-03 — Real-time Operations – TOP-001 through TOP-008 and PER-001</p> <p>Draft 5 of TOP-001-2, TOP-002-2, and TOP-003-2, the Implementation Plan, and associated VRFs and VSLs have been posted for comment.</p> <p>Concerns:</p> <ol style="list-style-type: none"> 1. TOP-001-2: R9, R10, & R11 stipulate returning SOLs identified as supporting internal area reliability within 30 minutes. 2. TOP-003-2: R1.1 requires each TOP & BA to have a list of data to be exchanged for operating parameters for BES Facilities and <u>Facilities at voltage levels lower than the BES</u> 	<p>Initial Ballot and Non-Binding Poll</p> <p>Comment</p>	<p>06/09/2011</p> <p>06/09/2011</p>

Standards	Project	Activity	Due Date
NERC	<p>Project 2010-17 — BES Definition Exception Process</p> <p>Proposed revision to the NERC RoP to add <i>Appendix 5C Bulk Electric System Component Exception Procedure</i>.</p> <p>Concerns</p> <ol style="list-style-type: none"> 1. Proposed procedure leaves the entities permitted to submit an exception request too broad. This should be an asset owner(s) decision. Also the Regional Entity should not be permitted to submit an exception. 2. Currently drafted appeal process essentially leaves NERC as the judge and jury. 	Comment	06/10/2011

FERC Notice of Proposed Rulemaking (NOPR) on Availability of E-Tag Information to Commission Staff (RM11-12)

- In this NOPR, the FERC proposes to require NERC to make available to Commission staff, on an ongoing basis, access to complete electronic tagging data used to schedule the transmission of electric power in wholesale markets.
- Comments due June 27, 2011
- NOPR link <http://www.ferc.gov/whats-new/comm-meet/2011/021711/E-4.pdf>

- Ft. Martin CVI- 4 potential violations
 - Pending Hearing
- CIP Spot Check & 693 Audit still pending RFC response
- Kenzie Creek CVI- pending RFI
- Yorkana EA & RFI
- NUC-001 Spot Check- 11 units
- Spot Check Related to 2010 Freq Excursion
 - IRO-003: Monitoring Capability
 - TOP-006: Monitoring Equipment

- New type of audit for FERC- Performance Audit
 - Very few of these done to date
- Stated Purpose – focus is on Improving PJM's performance
- Very Little Structure, Agenda was a guideline at best
- The Audit rarely focused on the specifics of a NERC standard/requirement

Areas of Concern

- PJM's TOP Registration
 - Trying to understand how PJM's agreements and manuals govern and guide the TO/TOP relationship
- PJM's reliance on its TO's for actions, knowledge, and data
- Redundancy Requirements – are they robust enough?
 - Down to the TO level
- System Protection – Coordination and Familiarity
- PJM's definition and implementation of SOLs and IROLs

- **Next Steps**

- PJM will receive another data request to clarify the 693 issues identified (within 2 weeks?)
- CIP Audit – June 13-17
- Follow-up CIP data request
- Future visits and RFIs? - TBD

